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21 *Attorneys for Defendants Apartment Management  
22 Consultants, LLC, and Rene Richardson*

23 **UNITED STATES DISTRICT COURT**

24 **DISTRICT OF NEVADA**

25 UNITED STATES OF AMERICA *ex rel.*  
26 PEGGY THORNTON, Realtor,

27 and

28 PEGGY THORNTON,

Plaintiff,

29 vs.

30 PORTOLA DEL SOL OPERATOR, LLC, a  
31 foreign limited-liability company; TMIF II  
32 PORTOLA, LLC, a foreign limited-liability  
33 company; APARTMENT MANAGEMENT  
34 CONSULTANTS, LLC, a foreign limited  
35 liability company; and RENE  
36 RICHARDSON, as AGENT of PORTOLA  
37 DEL SOL OPERATOR, LLC,

38 Defendants.

39 Case No. 2:21-cv-01123-APG-BNW

40 **Stipulation and Order to Extend Deadline  
41 For Defendants Apartment Management  
42 Consultants, LLC and Rene Richardson to  
43 Respond to the Second Amended  
44 Complaint**

45 **(First Request)**

1 Relator Peggy Thornton and Defendants Apartment Management Consultants, LLC and  
 2 Rene Richardson (collectively “AMC”), by and through their respective undersigned counsel,  
 3 hereby stipulate to extend AMC’s deadline to respond to Ms. Thornton’s Second Amended  
 4 Complaint (“SAC”) by three weeks, to and including **October 29, 2024**, with the following  
 5 background and reasons:

- 6 1. Ms. Thornton filed her SAC on September 24, 2024. ECF No. 108.
- 7 2. Under FRCP 15, AMC’s response to the SAC is therefore due on October 8, 2024.
- 8 3. AMC requires additional time to assess the SAC in light of the multiple rounds of  
 9 motion-to-dismiss briefing filed thus far. Additionally, AMC’s counsel have both been traveling  
 10 the past several weeks for out-of-state hearings, depositions, and meetings, and Attorney Gil  
 11 Kahn is currently observing the Jewish High Holidays.
- 12 4. The requested extension will not cause undue delay given that it mirrors the  
 13 extension that AMC and co-defendant TMIF have separately stipulated to (ECF No. 110), and  
 14 this Court recently granted the stipulation staying discovery in this matter until any challenges to  
 15 the SAC are resolved. ECF No. 109.

16 **IT IS SO STIPULATED.**

17  
 18 Dated: October 8, 2024.

19 SNELL & WILMER L.L.P.

20 By: /s/ Gil Kahn  
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 28 *Attorneys for Defendant Apartment  
 Management Consultants, LLC and Rene  
 Richardson*

Dated: October 8, 2024.

NEVADA LEGAL SERVICES

By: /s/ Kristopher Pre  
 Kristopher Pre  
 Nevada Bar. No. 14106  
 Elizabeth S. Carmona  
 Nevada Bar No. 14687  
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 Las Vegas, Nevada 89101

*Attorneys for Relator*

## ORDER

Good cause appearing, Ms. Thornton and AMC's stipulation is **GRANTED**. AMC's deadline to respond to the Second Amended Complaint is extended to and including October 29, 2024.

## IT IS SO ORDERED.

Ben Weller  
UNITED STATES MAGISTRATE JUDGE

DATED: 10/9/2024

**Snell & Wilmer** L.L.P. LAW OFFICES  
1700 South Pavilion Center Drive, Suite 9135  
Las Vegas, Nevada 89135  
702.784.5200

**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **Stipulation and Order to Extend Deadline For Defendants Apartment Management Consultants, LLC and Rene Richardson to Respond to the Second Amended Complaint** by method indicated below:

- BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
  - BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
  - BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.
  - BY PERSONAL DELIVERY:** by causing personal delivery by, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
  - BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.
  - BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

DATED October 8, 2024

/s/ Tiy Lewis  
An employee of SNELL & WILMER L.L.P.

4882-2222-0269